

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BRUCE LEE ENTERPRISES, LLC,

Plaintiff,

v.

A.V.E.L.A., INC., and LEO VALENCIA, an
Individual, URBAN OUTFITTERS, INC., and
TARGET CORPORATION,

Defendants.

Case No. 1:10-cv-2333 (MEA)

ECF Case

**DECLARATION OF MELISSA W. WOO IN SUPPORT OF MOTION TO WITHDRAW
AS AN ATTORNEY OF RECORD**

I, Melissa W. Woo, declare under penalty of perjury that the following is true and correct:

1. I am an attorney at law and one of the attorneys for Defendants A.V.E.L.A., Inc. (“AVELA”), Leo Valencia (“Valencia”), and Target Corporation (“Target”) and Urban Outfitters, Inc. (“Urban Outfitters”) in the above-captioned matter. I am admitted to this Court *pro hac vice*. I submit this declaration in support of Melissa W. Woo’s (“Woo”) Motion to Withdraw as Counsel.

2. I am employed as an in-house staff attorney for V. International Fine Arts and Publishing, Inc. (“V. International”). My responsibilities as an in-house staff attorney include, but are not limited to providing legal services, including litigation services to certain entities and individuals, which include AVELA and Valencia. I am also one of the attorneys for Urban Outfitters and Target. My representation of Urban Outfitters and Target is subject to the terms of a confidential agreement between AVELA and one of its licensors.

3. On January 8, 2014, I provided written notice of resignation of my position as in-house staff attorney, effective January 22, 2014 to V. International. On the same date, I provided written notice of resignation to Leo Valencia, as an individual and as principal of A.V.E.L.A., Inc. of the resignation of my employment, effective January 22, 2014. The terms of my employment relationship, termination thereof and withdrawal are confidential and privileged. Should the Court desire additional information, I will be available to appear *in camera* via conference or declaration outside the presence of the parties.

4. On January 8, 2014, I provided written notice to Mr. Valencia of my intent to withdraw in the above-captioned case.

5. On January 17, 2014, I notified both Urban Outfitters and Target of my intent to withdraw in the above-captioned case due to my resignation as in-house staff attorney, effective January 22, 2014.

6. There is currently a trial date set for April 10, 2014. However, I am not the only attorney for Defendants and I am not the lead trial attorney. I am informed that AVELA has identified and engaged a trial attorney to try the case on behalf of Defendants. Defendants also have New York counsel in this matter and who will continue to work on the matter and receive notice of any future pleadings, motions, discovery, and any and all other communications concerning this matter. As such, there will be no prejudice to Defendants and no disruption in the case schedule.

7. Woo respectfully submits that she should not be required to work on the matter given that she will no longer be employed by V. International as of January 22, 2014. Woo respectfully moves this Court for an Order (i) granting leave to withdraw as an attorney of record

for Defendants A.V.E.L.A., Inc., Leo Valencia, Urban Outfitters and Target and (ii) such other and further relief as the Court deems just and proper.

8. No previous application for the relief sought herein has been made.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this Declaration was executed on January 20, 2014.

/s/ Melissa W. Woo

MELISSA W .WOO
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CERTIFICATE OF SERVICE

I hereby certify that I caused true and correct copies of the foregoing Declaration of Melissa W. Woo In Support of Motion to Withdraw as an Attorney of Record for Defendants to be served via the ECF system for the Southern District of New York, which will effectuate service on the following counsel of record:

Theodore Minch
Sovich Minch, LLP
10099 Chesapeake Drive, Suite 100
McCordsville, Indiana 46055

Bonnie Lynn Mohr
Law Office of Bonnie L. Mohr
236 W. 26th Street, Suite 303
New York, NY 10001

James R. Steffen
Faegre Baker Daniels
2200 Wells Fargo Center
90 S. Seventh Street
Minneapolis, Minnesota 55402-3901

I hereby certify that I caused true and correct copies of the foregoing Declaration of Melissa W. Woo In Support of Motion to Withdraw as an Attorney of Record for Defendants to be served via first class mail to:

A.V.E.L.A., Inc. and Leo Valencia
1135 Terminal Way, Number 209
Reno, Nevada, 89502

Urban Outfitters, Inc.
5000 S. Broad Street
Philadelphia, PA 19112
Attn: Michael Silbert, Esq.

This 20st day of January, 2014.

/s/Melissa W. Woo
Melissa W. Woo